

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BURBERRY LIMITED; GUERLAIN, SOCIÉTÉ PAR
ACTIONS SIMPLIFIÉE (SAS); GUERLAIN, INC.;
HERMÈS INTERNATIONAL; KENZO; LVMH
FRAGRANCE BRANDS; MICHAEL KORS, L.L.C.;
PARFUMS CHRISTIAN DIOR; and PRL USA
HOLDINGS, INC.; TIMBERLAND, a division of VF
OUTDOOR, LLC; and TBL LICENSING LLC,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and
XYZ COMPANIES,

Defendants.

CIVIL ACTION NO.

19 CV _____

COMPLAINT

Plaintiffs Burberry Limited; Guerlain, Société Par Actions Simplifiée (SAS); Guerlain, Inc.; Hermès International; Kenzo; LVMH Fragrance Brands; Michael Kors, L.L.C.; Parfums Christian Dior; PRL USA Holdings, Inc.; Timberland, a division of VF Outdoor, LLC; and TBL Licensing LLC, (all collectively, “Plaintiffs”), through their attorneys, complaining of Defendants, allege as follows:

STATEMENT OF THE CASE

1. Plaintiffs seek monetary and injunctive relief against Defendants for numerous causes of action, including but not limited to, (i) trademark counterfeiting, in violation of 15 U.S.C. § 1114; (ii) trademark infringement, in violation of 15 U.S.C. § 1114; (iii) false descriptions/false designations of origin, in violation of 15 U.S.C. § 1125; and (iv) common law trademark infringement and unfair competition.

2. Certain areas of New York City have long been major distribution hubs for counterfeit goods that are sold throughout the United States. Wholesale and retail sales of counterfeit goods occur frequently and regularly from locations around the city. Plaintiffs in this case, and trademark holders in general, have been plagued by the sale and distribution of counterfeit goods at locations all over New York City for years. To combat this illegal activity and protect their world-famous and valuable names, reputations, and trademarks, Plaintiffs have, at great expense, commenced and led enforcement efforts in and around New York City. Plaintiffs regularly work with law enforcement in operations against the individuals and entities selling counterfeit goods bearing its trademarks. Arrests for trademark counterfeiting have been made routinely by the New York City Police Department and by other agencies. The Mayor's Office of Special Enforcement for the City of New York has conducted numerous enforcement operations against the sellers of counterfeit goods.

JURISDICTION AND VENUE

3. These claims arise under the Trademark Act of 1946, 15 U.S.C. § 1051, *et seq.*, particularly under 15 U.S.C. § 1114(1). This Court has subject matter jurisdiction over the claims in this action which relate to trademark counterfeiting and infringement, dilution and false designations of origin and false descriptions pursuant to the provisions of 28 U.S.C. §§ 1331 and 1338 and 15 U.S.C. § 1121.

4. This Court has supplemental jurisdiction over the claims in this Complaint which arise under state statutory and common law pursuant to 28 U.S.C. § 1367(a), since the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

5. Venue is proper in this judicial district under 28 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to the claims alleged by Plaintiffs occurred within the City, State and County of New York.

THE PARTIES

6. Plaintiff Burberry Limited is a corporation duly organized and existing under the laws of the United Kingdom and having an office and principal place of business at Horseferry House, Horseferry Road, London, SW1P 2AW, United Kingdom. Burberry maintains an office in the United States at 444 Madison Avenue, New York, NY 10022 (“Burberry”).

7. Plaintiff Guerlain, Société Par Actions Simplifiée (SAS), is a French corporation having a principal place of business at 68, Avenue Des Champs Elysees, Paris, France 7500.

8. Plaintiff Guerlain, Inc. is a New York corporation having a principal place of business at 19 East 57th Street, New York, New York 10022 (Guerlain and Guerlain, Inc., collectively, “Guerlain”).

9. Plaintiff Hermès International is a corporation, organized and existing under the laws of France, having its principal place of business located at 24, rue du Faubourg Saint-Honore, Paris, France (“Hermès”).

10. Plaintiff Kenzo is a French corporation having a principal place of business at 18 Rue Vivienne, Paris, France 75002 (“Kenzo”).

11. Plaintiff LVMH Fragrance Brands is a French corporation (société par actions simplifiée) having a principal place of business at 77, Rue Anatole France, Levallois Perret, France 92300 (“Givenchy”).

12. Plaintiff Michael Kors, L.L.C. is a corporation duly organized and existing under the laws of the State of Delaware with its principal place of business located at 11 West 42nd Street, New York, NY 10036 (“MK”).

13. Plaintiff Parfums Christian Dior is a French corporation having a principal place of business at 33 Avenue Hoche, Paris, France 75008 (“Dior”).

14. Plaintiff PRL USA Holdings, Inc. is a Delaware Corporation with its principal place of business located at 650 Madison Avenue, New York, NY 10022 (“PRL”). PRL is the successor in interest to all trademark ownership rights previously held by Polo Ralph Lauren, L.P.

15. Plaintiff Timberland, a division of VF Outdoor, LLC, is a corporation duly organized and existing under the laws of the State of Delaware with a principal place of business located at 200 Domain Drive, Stratham, New Hampshire 03885.

16. Plaintiff TBL Licensing LLC, an affiliate of Timberland, is a corporation duly organized and existing under the laws of the State of Delaware with a principal place of business located at 200 Domain Drive, Stratham, New Hampshire 03885 (Timberland, a division of VF Outdoor, LLC, and TBL Licensing LLC, collectively, “Timberland”).

17. Plaintiffs are informed and believe and thereupon allege that at all times relevant hereto defendants various John Does, Jane Does, and XYZ Companies (collectively referred to as “Defendants”), are and have been doing business in the city and State of New York at the following locations: 1212A Broadway, New York, New York 10001; 270 West 38th Street, Suite 600A, New York, New York 10018; 9 West 31st Street, Two Vans in SP+ Parking Garage, White Ford Van, “Xclusive Glass & Mirror” on Passenger Door, No License Plate and Blue Chrysler Minivan, Alabama License Plate No. OT52743, New York, New York 10018; and 35 West 31st Street, New York, New York 10018.

18. Plaintiffs are informed and believe and thereupon allege that at all times relevant hereto Defendants have purchased, sold, and/or distributed counterfeit goods bearing Plaintiffs' Federally Registered Trademarks, as defined below in paragraph 24.

19. Upon information and belief, due to the nature of Defendants and their business practices, the identities of the various John Does, Jane Does, and XYZ Companies are not presently known, and the Complaint will be amended, if appropriate, to include the name or names of said individuals or companies when such information becomes available.

PLAINTIFFS' ACTIVITIES

20. Plaintiffs are industry leaders in the design, marketing, and distribution of a variety of merchandise including but not limited to apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, and watches bearing Plaintiffs' Federally Registered Trademarks.

21. For decades, Plaintiffs have developed their reputations and distinctive images across expanding product lines in both domestic and international markets.

22. Plaintiffs advertise, market, and sell their merchandise through numerous distribution channels including but not limited to exclusive retail stores, department stores, and online through Plaintiffs' websites.

23. Plaintiffs annually expend millions of dollars advertising their products.

24. Plaintiffs are the owners of numerous trademark registrations with the United States Patent & Trademark Office, including but not limited to those listed on Exhibit A attached hereto (hereinafter collectively referred to as "Plaintiffs' Federally Registered Trademarks").

25. Plaintiffs are the exclusive distributors or licensors in the United States of their merchandise, all of which bear one or more of Plaintiffs' Federally Registered Trademarks.

26. Plaintiffs are responsible for designing and/or licensing, assembling, finishing, marketing and selling in interstate commerce high quality apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, watches, and many other products.

27. Plaintiffs' Federally Registered Trademarks are in full force and effect and many have become incontestable pursuant to 15 U.S.C. § 1065.

28. Plaintiffs have used Plaintiffs' Federally Registered Trademarks for many years, and in some instances decades, on and in connection with their merchandise.

29. Plaintiffs' Federally Registered Trademarks identify high quality merchandise originating with Plaintiffs.

30. Plaintiffs have gone and continue to go to great lengths to protect their names and enforce Plaintiffs' Federally Registered Trademarks.

DEFENDANTS' INFRINGING ACTIVITIES

31. Upon information and belief, Defendants have infringed, continue to infringe, and threaten to further infringe Plaintiffs' Federally Registered Trademarks by manufacturing, distributing and selling unauthorized merchandise, including but not limited to high quality apparel, belts, watches, handbags, and fragrances. The unauthorized products, which are being manufactured, distributed, and/or sold by Defendants, bear unauthorized copies of Plaintiffs' Federally Registered Trademarks. Defendants' counterfeiting and infringing activities constitute unauthorized public display and distribution of products bearing Plaintiffs' Federally Registered Trademarks.

32. Long after Plaintiffs' use and registration of Plaintiffs' Federally Registered Trademarks, Defendants, on information and belief, commenced the manufacture, distribution, and/or sale of merchandise bearing counterfeits and infringements of Plaintiffs' Federally Registered

Trademarks as those trademarks appear on Plaintiffs' products and as shown in Exhibit A to this Complaint.

33. Upon information and belief, the activities of Defendants complained of herein constitute willful and intentional infringement of Plaintiffs' Federally Registered Trademarks, are in total disregard of Plaintiffs' rights, and were commenced and have continued in spite of Defendants' knowledge that the use of any of Plaintiffs' Federally Registered Trademarks, or copies or colorable imitations thereof, was and is in direct contravention of Plaintiffs' rights.

34. Use by Defendants of copies of Plaintiffs' Federally Registered Trademarks has been without Plaintiffs' consent, is likely to cause confusion and mistake in the minds of the purchasing public, and, in particular, tends to and does falsely create the impression that the goods sold by Defendants are authorized, sponsored, or approved by Plaintiffs when, in fact, they are not.

**A. 1212A Broadway
New York, New York 10001**

35. On February 13, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks were being manufactured, distributed, and/or sold. While at this location, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Burberry, Dior, Givenchy, Kenzo, MK, PRL, and other brands. The investigator then made an evidential purchase of counterfeit Burberry, Dior, Givenchy, PRL and other brands' fragrances for three hundred thirty U.S. Dollars (\$330.00).

36. Upon information and belief, the defendants at this location likely sell other counterfeits of other brands' products besides those observed by Plaintiffs' investigator, including but not limited to counterfeit product manufactured and distributed by Guerlain which is a subsidiary

of the same parent company as Dior, Kenzo, and Givenchy. Counterfeiters typically store and/or offer for sale numerous brands, some of which may not have been visible to Plaintiffs' investigator on the day he or she made observations or evidential purchases.

37. Upon information and belief, the defendants at this location continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

**B. *270 West 38th Street*
 Suite 600A
 *New York, New York 10018***

38. Plaintiffs previously conducted a civil seizure of counterfeit merchandise in at this location on or about September 15, 2018. Plaintiffs seized over 1,700 counterfeit items bearing the trademarks of Burberry, Hermès, MK, and others.

39. On February 15, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks were being manufactured, distributed, and/or sold. While at this location, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Burberry, Hermès, MK, Timberland, and other brands. The investigator then made an evidential purchase of counterfeit Burberry, MK, and another brand's handbags for three hundred twenty U.S. Dollars (\$320.00).

40. On February 28, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks were still being manufactured, distributed, and/or sold. While at this location, the investigator again observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Burberry, Hermès, MK, and other brands. The investigator then made an evidential purchase of counterfeit MK handbags for three hundred five U.S. Dollars (\$305.00).

41. Upon information and belief, the defendants at this location continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

C. 9 West 31st Street

Two Vans in SP+ Parking Garage:

***White Ford Van, "Xclusive Glass & Mirror" on Passenger Door, No License Plate and Blue Chrysler Minivan, Alabama License Plate No. OT52743
New York, New York 10018***

42. On February 15, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks were being manufactured, distributed, and/or sold. While at the location, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Hermès and Timberland. The investigator then made an evidential purchase of counterfeit Timberland footwear and Hermès accessories for one hundred U.S. Dollars (\$100.00).

43. On February 28, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks were still being manufactured, distributed, and/or sold. While at the location, the investigator again observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Hermès and Timberland.

44. Upon information and belief, the defendants at this location continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

D. 35 West 31st Street

New York, New York 10018

45. Plaintiffs previously conducted a civil seizure of counterfeit merchandise in at this location on or about May 4, 2017. Plaintiffs seized over 1,500 counterfeit items bearing the trademarks of Burberry, Hermès, MK, PRL, and others.

46. On February 28, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks were being manufactured, distributed, and/or sold. While at this location, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Burberry, Dior, Givenchy, Hermès, Kenzo, MK, PRL, and other brands. The investigator then made an evidential purchase of counterfeit Burberry, Dior, and Kenzo fragrances for three hundred eighty U.S. Dollars (\$380.00).

47. Upon information and belief, the defendants at this location likely sell other counterfeits of other brands' products besides those observed by Plaintiffs' investigator, including but not limited to counterfeit product manufactured and distributed by Guerlain which is a subsidiary of the same parent company as Dior, Kenzo, and Givenchy. Counterfeiters typically store and/or offer for sale numerous brands, some of which may not have been visible to Plaintiffs' investigator on the day he or she made observations or evidential purchases.

48. Upon information and belief, the defendants at this location continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

**FIRST CAUSE OF ACTION
TRADEMARK COUNTERFEITING
15 U.S.C §1114**

49. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

50. Defendants have used spurious designations that are identical with, or substantially indistinguishable from, Plaintiffs' Federally Registered Trademarks on goods covered by registrations for Plaintiffs' Federally Registered Trademarks.

51. Defendants are intentionally and willfully using these spurious designations knowing they are counterfeit in connection with the advertising, sale, offering for sale and distribution of counterfeit goods for their own personal financial gain and such intentional and willful conduct by the Defendants makes this an exceptional case.

52. Defendants' use of the Plaintiffs' Federally Registered Trademarks to advertise, offer for sale, sell and distribute Defendants' counterfeit products was and is without the consent of Plaintiffs.

53. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks on and in connection with the advertising and sale of counterfeit goods constitutes Defendants' use of Plaintiffs' Federally Registered Trademarks in commerce.

54. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks as set forth above is likely to:

- (a) cause confusion, mistake and deception;
- (b) cause the public to believe that Defendants' counterfeit products are the same as Plaintiffs' products and/or that Defendants are authorized, sponsored or approved by Plaintiffs or that Defendants are affiliated, connected or associated with or in some way related to Plaintiffs; and
- (c) result in Defendants unfairly benefiting from Plaintiffs' advertising and promotion and profiting from the reputation of Plaintiffs and Plaintiffs' Federally Registered Trademarks all to the substantial and irreparable injury of the public, Plaintiffs and Plaintiffs' Federally Registered Trademarks and the substantial goodwill represented thereby.

55. Defendants' acts as aforesaid constitute trademark counterfeiting in violation of Section 32 of the Lanham Act, 15 U.S.C. §1114.

56. Plaintiffs have no adequate remedy at law and have suffered and continue to suffer irreparable harm and damage as a result of Defendants' acts as aforesaid in an amount not thus far determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

57. Defendants' wrongful acts of counterfeiting will continue unless enjoined by this Court.

58. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**SECOND CAUSE OF ACTION
TRADEMARK INFRINGEMENT
15 U.S.C. §1114**

59. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

60. Plaintiffs' Federally Registered Trademarks are fanciful and arbitrary and are associated in the mind of the public with Plaintiffs.

61. Based on Plaintiffs' extensive advertising, sales and the wide popularity of Plaintiffs' products, Plaintiffs' Federally Registered Trademarks have acquired secondary meaning so that any product and advertisement bearing such trademarks is immediately associated by purchasers and the public as being a product and affiliate of Plaintiffs.

62. Defendants use Plaintiffs' Federally Registered Trademarks in connection with Defendants' sale, distribution and advertising of their counterfeit and infringing goods.

63. Defendants' activities as aforesaid constitute Defendants' use in commerce of Plaintiffs' Federally Registered Trademarks.

64. Defendants have used Plaintiffs' Federally Registered Trademarks without Plaintiffs' consent or authorization. Defendants' use, including the sale and distribution of infringing products in interstate commerce, is likely to cause confusion and mistake in the minds of the public, leading the public to believe that Defendants' products emanate or originate from Plaintiffs, or that Plaintiffs have approved, sponsored or otherwise associated themselves with Defendants, which is untrue.

65. Defendants have intentionally used Plaintiffs' Federally Registered Trademarks in connection with the offering for sale, sale, and distribution of counterfeit goods, knowing they are the exclusive property of Plaintiffs.

66. Defendants' conduct is intended to exploit the goodwill and reputation associated with Plaintiffs' Registered Trademarks.

67. Plaintiffs have no control over the quality of Defendants' counterfeit merchandise. Because of the very real likelihood of confusion as to the source of Defendants' products, Plaintiffs' reputation and valuable goodwill in the Trademarks is at the mercy of Defendants' unscrupulous tactics.

68. Defendants' activities as aforesaid create the false and misleading impression that Defendants are sanctioned, assigned or authorized by Plaintiffs to use Plaintiffs' Federally Registered Trademarks to advertise, manufacture, distribute, appraise, offer for sale or sell counterfeit products bearing Plaintiffs' Federally Registered Trademarks when Defendants are not so authorized.

69. Defendants engage in the aforementioned activity with the intent to confuse and deceive consumers into believing that Defendants and the goods they sell are in some way sponsored by, affiliated or associated with Plaintiffs when the Defendants are not.

70. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks as set forth above has resulted in Defendants unfairly benefiting from Plaintiffs' advertising and promotion and profiting from Plaintiffs' reputation and Plaintiffs' Federally Registered Trademarks, to the substantial and irreparable injury of the public, Plaintiffs and Plaintiffs' Federally Registered Trademarks and the substantial goodwill represented thereby.

71. Defendants' aforesaid acts constitute trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. §1114.

72. Defendants' acts have caused, and will continue to cause, great and irreparable injury to Plaintiffs, and unless such acts are restrained by this Court, they will continue, thereby causing Plaintiffs to continue to suffer great and irreparable injury. Plaintiffs have no adequate remedy at law.

73. Plaintiffs are informed and believe and thereon allege that Defendants' infringement is both intentional and egregious.

74. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

75. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**THIRD CAUSE OF ACTION
FALSE DESIGNATIONS OF ORIGIN,
FALSE DESCRIPTIONS AND REPRESENTATIONS
15 U.S.C. §1125(a)**

76. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

77. Defendants have, in connection with their goods, used in commerce, and continue to use in commerce, Plaintiffs' Federally Registered Trademarks.

78. Defendants have affixed, applied and used in connection with their sale of goods, false designations of origin and false and misleading descriptions and representations, including Plaintiffs' Federally Registered Trademarks, which tend falsely to describe the origin, sponsorship, association or approval by Plaintiffs of the goods sold by the Defendants.

79. Defendants use one or more of Plaintiffs' Federally Registered Trademarks with full knowledge of the falsity of such designations of origin, descriptions and representations, all to the detriment of Plaintiffs.

80. Defendants' use of Plaintiffs' Federally Registered Trademarks on the counterfeit goods constitutes false descriptions and representations tending to falsely describe or represent Defendants and Defendants' products as being authorized, sponsored, affiliated or associated with Plaintiffs.

81. Defendants use one or more of Plaintiffs' Federally Registered Trademarks on counterfeit goods with the express intent to cause confusion and mistake, to deceive and mislead the purchasing public, to trade upon the high quality reputation of Plaintiffs and to improperly appropriate to themselves the valuable trademark rights of Plaintiffs.

82. Defendants' aforesaid acts constitute the use in commerce of false designations of origin and false and/or misleading descriptions or representations, tending to falsely or misleadingly describe and/or represent Defendants' products as those of Plaintiffs in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

83. Defendants' wrongful acts will continue unless enjoined by this Court.

84. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

85. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**FOURTH CAUSE OF ACTION
FEDERAL TRADEMARK DILUTION
15 U.S.C. & 1125(c)**

86. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

87. Plaintiffs are the exclusive owners of Plaintiffs' Federally Registered Trademarks listed on Exhibit A attached hereto.

88. Defendants' use of Plaintiffs' Federally Registered Trademarks on the counterfeit goods they sell constitutes Defendants' commercial use in commerce of Plaintiffs' Federally Registered Trademarks.

89. Plaintiffs' Federally Registered Trademarks have been used for years, and in some instances decades, and are so globally recognized and associated with Plaintiffs that they are entitled to be recognized as famous and distinctive under 15 U.S.C. § 1125(c).

90. Plaintiffs' Federally Registered Trademarks have come to have a secondary meaning indicative of origin, relationship, sponsorship and/or association with the Plaintiffs and its distinctive reputation for high quality. The purchasing public is likely to attribute to Plaintiffs, Defendants' use of Plaintiffs' Federally Registered Trademarks as a source of origin, authorization and/or sponsorship for the products Defendants sell and further, purchase Defendants' products in the erroneous belief that Defendants are associated with, sponsored by or affiliated with Plaintiffs, when Defendants are not.

91. Plaintiffs have not authorized or licensed the use of Plaintiffs' Federally Registered Trademarks to Defendants.

92. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks in their marketing, sale and distribution of counterfeit products are diluting the distinctive quality of Plaintiffs' Federally Registered Trademarks and the goodwill associated with them in violation of Section 43(a) of the Lanham Act, 15 U.S.C § 1125(c).

93. Such conduct has injured Plaintiffs and said injury will continue unless the Court enjoins Defendants from committing further wrongful acts.

94. Upon information and belief, Defendants intentionally and willfully utilized Plaintiffs' Federally Registered Trademarks and traded on Plaintiffs' reputation and goodwill.

95. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

96. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**FIFTH CAUSE OF ACTION
INJURY TO BUSINESS REPUTATION AND DILUTION
NEW YORK GENERAL BUSINESS LAW § 360-1**

97. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

98. Plaintiffs, on behalf of the general public, as well as for themselves seek recovery from Defendants for violation of New York General Business Law § 360-1, et seq.

99. By virtue of Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks, such use trading on the good will associated with Plaintiffs, Defendants have misled and will continue to mislead the public into assuming a connection between Plaintiffs and Defendants' products.

100. By falsely suggesting a connection with or sponsorship by Plaintiffs, Defendants are likely to cause public confusion constituting unfair competition within the meaning of New York Business Law § 360-1.

101. If such action on the part of Defendants continue, Plaintiffs will suffer irreparable harm of a continuing nature for which there is no adequate remedy at law.

102. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

103. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

**SIXTH CAUSE OF ACTION
COMMON LAW TRADEMARK INFRINGEMENT**

104. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

105. Defendants' acts previously alleged herein constitute common law trademark infringement.

106. Plaintiffs are without adequate remedy at law, as Defendants' acts have caused Plaintiffs irreparable harm to its business reputation, good will and stature in the business community.

107. Plaintiffs are informed and believe and thereon allege that Defendants committed the above alleged acts oppressively, fraudulently, maliciously and in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore entitled to exemplary and punitive damages pursuant to the common law of the State of New York in an amount sufficient to punish, deter and make an example of Defendants.

108. The manufacture, distribution and sale of the unauthorized and infringing products by Defendants are without any permission, license or other authorization from Plaintiffs. The said unauthorized products are being distributed and sold in interstate commerce.

109. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

110. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

**SEVENTH CAUSE OF ACTION
MISAPPROPRIATION AND UNFAIR COMPETITION
UNDER NEW YORK COMMON LAW**

111. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

112. Defendants' aforesaid acts constitute misappropriation and infringement of Plaintiffs' property rights, goodwill and reputation and unfair competition under the common law of the State of New York.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment against Defendants as follows:

- I. That preliminary and permanent injunctions be issued enjoining and restraining Defendants and their officers, agents, servants, employees and attorneys and all those in active concert or participation with them, from:
 - A. Using any reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks to identify any goods or the rendering of any services not authorized by Plaintiffs;
 - B. Engaging in any course of conduct likely to cause confusion, deception or mistake, or to injure Plaintiffs' business reputation or dilute the distinctive quality of Plaintiffs' name and Plaintiffs' Federally Registered Trademarks;
 - C. Using a false description or representation including words or other symbols tending to falsely describe or represent Defendants' unauthorized goods as being those of Plaintiffs or sponsored by or associated with Plaintiffs and from offering such goods into commerce;

- D. Further infringing Plaintiffs' Federally Registered Trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, renting, displaying or otherwise disposing of any products not authorized by Plaintiffs bearing any simulation, reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;
- E. Using any simulation, reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks in connection with the rental, promotion, advertisement, display, sale, offering for sale, manufacture, production, circulation or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Plaintiffs, or to any goods sold, manufactured, sponsored or approved by, or connected with Plaintiffs;
- F. Making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act, which can or is likely to lead the trade or public, or individual members thereof, to believe that any products manufactured, distributed, sold or rented by Defendants is in any manner associated or connected with Plaintiffs, or is sold, manufactured, licensed, sponsored, approved or authorized by Plaintiffs;
- G. Constituting an infringement of any of Plaintiffs' Federally Registered Trademarks or of Plaintiffs' rights in, or to use or to exploit, said Registered Trademarks, or constituting any dilution of Plaintiffs' name, reputation or goodwill;
- H. Secreting, destroying, altering, removing, or otherwise dealing with the unauthorized products or any books or records which contain any information relating to the importing, manufacturing, producing, distributing, circulating, selling, marketing,

offering for sale, advertising, promoting, renting or displaying of all unauthorized products which infringe Plaintiffs' Federally Registered Trademarks;

I. Selling, offering for sale, or advertising any merchandise bearing Plaintiffs' Federally Registered Trademarks on the Internet or in e-commerce, including but not limited to all forms of social media; and

J. Effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (A) through (I).

II. Directing that Defendants deliver up for destruction to Plaintiffs all unauthorized products and advertisements in their possession or under their control bearing any of Plaintiffs' Federally Registered Trademarks or any simulation, reproduction, counterfeit, copy or colorable imitation thereof, and all plates, molds, matrices and other means of production of same pursuant to 15 U.S.C. §1118.

III. Directing such other relief as the Court may deem appropriate to prevent the trade and public from deriving any erroneous impression that any products manufactured, sold or otherwise circulated or promoted by Defendants are authorized by Plaintiffs or related in any way to Plaintiffs' products.

IV. Directing Defendants to supply Plaintiffs with the name and address of each person or entity from whom or from which has purchased any item bearing Plaintiffs' Federally Registered Trademarks.

V. Directing Defendants, within thirty (30) days after the service of judgment upon it, with notice of entry thereof, to file with the Court, and serve upon Plaintiffs, a written report under

oath setting forth in detail the manner in which Defendants have complied with paragraphs I through IV above.

VI. Awarding to Plaintiffs the Defendants' profits from its unlawful acts herein alleged as Defendants' total sales of merchandise bearing any one or more of the Plaintiffs' Federally Registered Trademarks, less any elements of cost or deductions proved by Defendants and allowed by law.

VII. Awarding to Plaintiffs the damages from Defendants' unlawful acts herein alleged.

VIII. Pursuant to 15 U.S.C. § 1117(a), directing Defendants to pay Plaintiffs all of the profits assessed pursuant to paragraph VI, *supra*, together with three times the amount of damages assessed pursuant to paragraph VII, *supra*, with prejudgment interest on the foregoing sums.

IX. In the event that the Court determines that Defendants intentionally used a mark knowing that such mark was a counterfeit mark, directing Defendants to pay Plaintiffs:

- A. Pursuant to 15 U.S.C. § 1117(a) and (b) all of the profits assessed pursuant to paragraph VI, *supra*; plus,
- B. Pursuant to 15 U.S.C. § 1117(a) and (b) three times the profits assessed pursuant to paragraph VI, *supra*, or three times the damages assessed pursuant to paragraph VII, *supra*, whichever is greater; and
- C. Prejudgment interest on the foregoing sums at an annual interest rate established under 26 U.S.C. § 6621(a)(2) commencing as of the date of the service of the complaint herein.

X. Ordering that Plaintiffs recover the costs of this action together with reasonable attorneys' and investigators' fees and prejudgment interest in accordance with 15 U.S.C. § 1117.


XI. Directing that this Court retain jurisdiction of this action for the purpose of enabling Plaintiffs to apply to the Court at any time for such further orders and interpretation or execution of any order entered in this action, for the modification of any such order, for the enforcement or compliance therewith and for the punishment of any violations thereof.

XII. Awarding to Plaintiffs such other and further relief as the Court may deem just and proper, together with the costs and disbursements which Plaintiffs have incurred in connection with this action.

Dated: March 11, 2019
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: 
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Attorneys for Plaintiffs

EXHIBIT A

BURBERRY LIMITED

TRADEMARK TRADEMARK	REGISTRATION NUMBER	REGISTRATION DATE	GOODS
BURBERRY	259,571	6-Aug-1929	Piece goods - namely, cloths, and stuffs of wool, worsted, or hair.
BURBERRY	260,843	27-Aug-1929	Clothing - namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; overalls for women and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children, hoods and toques for men, women, children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots of rubber and fabric or combinations of these materials for men, women, and children; shoes and slippers of leather, rubber, and fabric or combinations of these materials for men, women, and children; gloves for men, women, and children, of leather and fabric.
BURBERRY	1,133,122	15-Apr-1980	Handbags, travelling bags, leather travelling cases, attache cases, leather briefcases, purses, pocket wallets, umbrellas.
BURBERRY	1,607,316	24-Jul-1990	Spectacles, sunglasses, fitted cases, frames and lenses, all for sunglasses or for spectacles.
BURBERRY	1,747,765	19-Jan-1993	Wrist watches and straps and bracelets therefor, and cuff links.
BURBERRY	2,624,684	24-Sep-2002	Retail store services featuring clothing, watches, sunglasses, accessories, shoes, luggage, leather goods, and fragrance.
BURBERRY	2,629,931	8-Oct-2002	Fragrance; non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, cosmetic preparations for the hair, namely, shampoos, soaps for the body, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY	2,875,336	17-Aug-2004	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the

			aforesaid goods; cases and holders for portable computers and mobile telephones; watches, clocks and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and pocket watches, jewelry, imitation jewellery, tie-pins and cuff links; and jewelry boxes, hat and shoe ornaments all made of precious metal or coated therewith.
BURBERRY	3,879,249	23-Nov-2010	Articles of outer clothing, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats; blouses; casual coats; polo shirts; blouses; dresses; pyjamas; knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits; skirts; jackets; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments; hosiery; headwear; footwear; sports clothing, namely, sweat pants, sweat shirts, swimwear; sports footwear; tracksuits; ready-made linings, namely, finished textile linings for garments; ties; clothing belts; wraps; scarves; shawls and stoles; gloves.
BURBERRY	3,898,440	4-Jan-2011	Articles made from material and textile, namely, bed blankets, blanket throws, children's blankets, lap blankets, towels, handkerchiefs, cushion covers.
BURBERRY	4,004,568	2-Aug-2011	Cosmetics; aftershave preparations; non-medicated preparations for the bath and shower, body care preparations, skin care preparations, nail care preparations and accessories; room fragrances; baby creams, lotions, shampoos.
BURBERRY	4,212,001	25-Sep-2012	Visual and audio recordings featuring music, video, animation, voice, still photography; digital music downloadable from the internet; custom manufacture of clothing, custom manufacture of accessories, namely, bags, briefcases, handbags, wallets, purses, document holders, bags and cases for makeup, key rings, luggage, umbrellas, cases and holders for electronic devices, eyewear and cases for eyewear, belts; entertainment services, namely, production and online distribution of sound, music, and video recordings in the fields of music and fashion; providing non- downloadable music and video recordings in the fields of music and fashion for others via a global computer network; production and distribution of videos in the

			fields of music and fashion; design of clothing and fashion accessories for others.
BURBERRY	510,077	24-May-1949	Clothing - namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children; hoods and toques for men, women, and children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots for men, women, and children, of leather and rubber or combinations of these materials; shoes and slippers for men, women, and children; of leather, rubber, and fabric or combinations of these materials; gloves for men, women, and children of leather and fabric.
BURBERRY BRIT	3,029,220	13-Dec-2005	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY BRIT	3,910,300	25-Jan-2011	Clothing, namely, shirts, polo shirts, dresses, jumpers, sweaters, gilets, t-shirts, jeans, coats, trench coats, jackets.
BURBERRY CHECK	1,241,222	7-Jun-1983	Coats, top coats, jackets, trousers, slacks, waistcoats, skirts, capes, hats, bonnets, berets, shirts, scarves, shawls and blouses.
BURBERRY CHECK	1,855,154	20-Sep-1994	Watches and parts therefor; straps, bracelets for wrist watches; cuff links.
BURBERRY CHECK	2,015,462	12-Nov-1996	Socks.
BURBERRY CHECK	2,022,789	17-Dec-1996	Suitcases, traveling bags, holdalls, suit and garment carriers for travel, attache cases, document cases, briefcases, purses, drawstring pouches, wallets, billfolds, passport holders, key cases, handbags, shoulder bags, credit card cases, business card cases, toilet bags sold empty, toilet cases sold empty, shaving bags sold empty, tie cases for travel, umbrellas and parasols; traveling comforter, namely, fabric blanket-like articles for keeping warm, e.g., when traveling in cold

			climates, or for use as a stadium blanket; clothing for men and women, namely, scarves, pullovers, cardigans, sweaters, overcoats, raincoats, shirts, belts; slippers for men.
BURBERRY CHECK	2,845,852	25-May-2004	Sunglasses, spectacles, optical glasses; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; carrying cases and holders for portable computers and mobile telephones.
BURBERRY CHECK	3,529,814	11-Nov-2008	Non-metal key fobs; blankets, throws, handkerchiefs, textile used as linings for clothing and accessories, fabrics for use in the manufacture of clothing, footwear, headwear, hosiery, belts, bags, cases, holders and key rings, umbrellas, watches, jewelry, towels, blankets, throws; Coats, detachable coat linings, rainwear, ponchos, jackets, gilets, jerseys, jumpers, sweaters, blouses, shirts, polo shirts, t-shirts, vests, dresses, skirts, trousers, jeans, shorts, ski wear, sports shirts, sports trousers, sweat shirts, waterproof clothing, namely, coats, jackets, bikinis, sarongs, swimwear, bathrobes, boxer shorts, loungewear, nightwear, undergarments, ties, cravats, footwear, shoes, boots, athletic footwear, slippers, ballet slippers, socks, leggings, caps, hats, head scarves, belts, gloves, mufflers, scarves, shawls, stoles, pashminas, children's and infant's clothing, namely, coats, jackets, ponchos, jerseys, sweaters, blouses, shirts, t-shirts, singlets, vests, tank tops, waistcoats, suits, dresses, skirts, trousers, jeans, shorts, children's headwear, children's swimwear, children's nightwear, children's under garments, and one-piece clothing, headwear, footwear; cloth bibs; teddy bears; retail store services in the fields of clothing, accessories, footwear, headgear, luggage, leather goods, timepieces, jewelry, eyewear and fragrances.
BURBERRY CHECK	4,123,508	10-Apr-2012	Telephones, mobile telephones, mobile electronic devices, namely, PDAs (personal digital assistants), smart phones, personal entertainment devices, namely, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers, portable digital audio and/or video players, and accessories for the foregoing, namely, headsets, headphones, covers, fascia, lanyards specially designed for mobile electronic devices and mobile telephones, stylus, battery chargers, phone jewelry and accessory charms for mobile electronic devices; cases and


			holders for telephones, mobile telephones and mobile electronic devices, namely, for PDAs (personal digital assistants), smart phones, personal entertainment devices in the nature of electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players.
BURBERRY CHECK	4,166,277	3-Jul-2012	Non-medicated toilet preparations; cosmetic preparations for the bath and shower; non-medicated body and skin care preparations; cosmetic preparations for care of teeth and for hair; nail care preparations and polish; nail accessories, namely, false nails; soaps; anti-perspirants, deodorants; perfumes, eau de cologne, eau de toilette and toilet water; essential oils, massage oil; pot pourri, room fragrance and incense; cleaning preparations for leather and non-leather goods; sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods, cases and holders for the aforesaid goods, and parts and fittings for all the aforesaid goods; cases and holders specially adapted for use with portable electronic devices, mobile telephones, portable audio and video systems and computers; camera cases; mobile phones and mobile phone accessories, namely, mobile phone covers and skins, charms and lanyards for mobile phones, mobile phone fascias in the nature of protective covers; watches, clocks and parts, fittings and cases for all the aforesaid goods; watch straps and bracelets therefore; jewellery, imitation jewellery, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings, charms, badges, shoe ornaments; jewellery boxes and cases; models and figures of precious metal; all-purpose carrying bags, trunks, valises, suitcases, travelling bags, garment bags, baby bags, baby carriers worn on the body, baby harnesses worn on the body, rucksacks, satchels, holdalls, handbags, shoulder bags, shopping bags, wheeled shopping bags; purses, pouches; wallets, key holders made of leather or imitations of leather, credit card holders of leather and imitations of leather, pochettes; labels, luggage labels and tags all made of leather and imitations of leather; cosmetic cases and bags sold empty, cases for manicure sets sold empty; jewellery rolls for travel; umbrellas, parasols; clothing for pets; horse blankets; collars and leashes for animals; textiles and textile items, namely, bed blankets, bed


			covers, bed linen, cot linen, duvets, and curtains; towels; face cloths; mattress covers; pillowcases; quilts and eiderdowns; bed sheets; table covers; unfitted fabric furniture covers, wall hangings, cushion covers; placemats of textile; handkerchiefs; travelling rugs; pet blankets; textile labels; clothing, namely, shirts, polo shirts, blouses, dresses, shorts, trousers, suits, skirts, jerseys, jumpers, sweaters, cardigans, gilets, t-shirts, singlets, vests, tank tops, waistcoats, jeans, pyjamas, coats, overcoats, trench coats, casual coats, raincoats, jackets, ponchos, blousons, capes, lingerie, underwear, undergarments, sleepwear, loungewear; ski wear, sports trousers, sports shorts, sports shirts, sports jackets, sweat pants, sweat shirts, sweat shorts, tracksuits, swimwear; ready-made linings sold as component parts of coats; clothing belts; ties, wraps, serapes, sarongs, scarves, shawls and stoles; gloves; tights, socks, stockings, hosiery, leggings; footwear; headwear.
BURBERRY CHECK	2,689,921	25-Feb-2003	Perfumes, eau de toilettes, body lotion; soaps; personal deodorants; eau de parfums; aftershaves; shampoo for the body; shower gels; bath gels.
BURBERRY CHECK (No Color)	2,728,709	24-Jun-2003	Fabrics for use in the manufacture of clothing, underclothes, swimwear, headwear, footwear, hosiery, socks; and belts; fabrics for use in the manufacture of cosmetic cases and bags, toiletry cases and bags, and shaving cases and bags; fabrics for use in the manufacture of purses, pouches, bags, luggage, carriers, travel bags, and suit and garment bags; fabrics for use in the manufacture of cases and holders for money, documents, keys, glasses, and ties; fabrics for use in the manufacture of umbrellas and parasols and cases thereof; fabrics for use in the manufacture of straps and bracelets for watches, and straps for shoes and bags; fabrics for use in the manufacture of lining for all the foregoing goods; comforters and blankets.
BURBERRY CHECK (No Color)	2,612,272	27-Aug-2002	Retail store services in the fields of clothing, accessories, shoes, luggage, leather goods and fragrances.
BURBERRY CHECK (No Color)	2,732,617	1-Jul-2003	Perfumes, eau de toilettes, eau de parfums; body lotion, soaps; personal deodorants; aftershave; shampoo for the hair and for the body; shower gels; bath gels; articles of

			<p>luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags; duffel and gym bags; overnight bags; school book bags, shoulder bags, tote bags, garment bags for travel, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetics bags sold empty; brief cases, satchels and portfolios; parasols, umbrellas, walking sticks; leather key fobs, leather key holders; articles of outerclothing, namely, coats, overcoats, trench coats, casual coats, raincoats, jackets and blousons, poloshirts, blouses, dresses, pyjamas, knitwear namely, jumpers, sweaters, gilets, knitted shirts, knitted skirts and knitted scarves; and shorts, trousers, suits, skirts, underclothes, hosiery, headwear, footwear, sports clothing namely, sports trousers, sports shorts, sports shirts, sports jackets, sports footwear; tracksuits, garments that can be attached to or detached from coats, raincoats, trench coats, or casual coats for additional warmth; ties, belts, wraps, serapes, scarves, shawls and stoles, gloves.</p>
BURBERRY CHECK (No Color)	4,441,542	26-Nov-2013	<p>Sunglasses, camera cases, spectacles, optical glasses, mobile phone accessories, namely, mobile phone covers charms and lanyards for mobile phones; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; cases and holders for portable electronic devices, namely, PDAs (personal digital assistants), smart phones, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players, mobile telephones, portable audio and video systems and computers; Watches, watch straps and bracelets therefor; jewelry, imitation jewelry, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings.</p>
BURBERRY LONDON	3,202,484	23-Jan-2007	<p>Articles of outerclothing, namely, coats, trench coats, casual coats, jackets; shirts, dresses; ties.</p>
EQUESTRIAN KNIGHT DEVICE	2,512,119	27-Nov-2001	<p>Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shampoos, shower gels and bath gels; shaving preparations; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags, overnight bags, shoulder bags, tote bags, carryall bags,</p>

			traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetic bags sold empty; brief cases, satchels and portfolios; cases for personal organizers and for mobile telephones; umbrellas, leather key fobs, leather key holders, and dog coats.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	863,179	7-Jan-1969	Coats, topcoats, jackets, suits, trousers, slacks, shorts, overalls, skirts, capes, hats, caps, bonnets, hoods, berets, neckties, stockings, socks, belts, boots, shoes, slippers, sandals, gloves, shirts, collars, pajamas, dressing gowns, cardigans, sweaters, pullovers, scarves, blouses, beach robes, dresses, skiwear, and handkerchiefs.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	1,622,186	13-Nov-1990	Sunglasses; spectacles; frames and lenses.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	2,952,399	17-May-2005	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; computer carrying cases and specialty holsters and cases for carrying mobile telephones; watches, and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and jewelry, imitation jewelry, tie-pins and cuff links; and jewelry boxes, all made of precious metal or coated therewith.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	4,036,908	11-Oct-2011	Accessories for covers, and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, smart phones, personal entertainment devices, tablet computers.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	1,903,508	4-Jul-1995	Watches and parts therefor; bracelets for wrist watches; jewelry; costume jewelry; tie pins and cuff links.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	3,766,097	30-Mar-2010	Textiles and textile goods, namely, household linen, bed linen, bath linen, bed blankets, blanket throws, children's blankets, beach towels, handkerchiefs, unfitted fabric furniture covers, fabrics for textile use and textile used as lining for clothing, cushion covers.




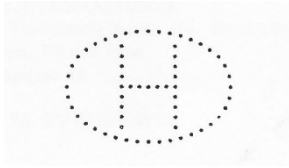


GUERLAIN SOCIÉTÉ PAR ACTIONS SIMPLIFIÉE (SAS) & GUERLAIN, INC.

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
GUERLAIN	3	Perfumes, eau de cologne, toilet waters, face cream; face, talcum, and bath powders, loose and in compact form	Dec. 30, 1924	193391	Guerlain, Inc. (NY)
SHALIMAR	3	Perfumes	Aug. 24, 1926	216906	Guerlain, Inc. (NY)
L'HEURE BLEUE	3	Perfumes and toilet water	Mar. 6, 1945	412381	Guerlain, Inc. (NY)
APRES L'ONDEE	3	Toilet water	Mar. 6, 1945	412388	Guerlain, Inc. (NY)
MITSOUKO	3	Perfumes and toilet waters	Mar. 6, 1945	412390	Guerlain, Inc. (NY)
	3	Perfume	Dec. 16, 1975	1027122	Guerlain, Inc. (NY)
	3	Toiletries-namely, perfume, eau de toilette, eau de cologne, eau de parfum, toilet soap	Apr. 16, 1985	1330436	Guerlain, Inc. (NY)
JARDINS DE BAGATELLE	3	Toilet water	Apr. 22, 1986	1390453	Guerlain, Inc. (NY)
SAMSARA		Perfumes, perfume de toilette, eau de toilette, body lotion, body shampoo, and skin creams	July 3, 1990	1604258	Guerlain, Inc. (NY)
HERITAGE	3	Eau de toilette, personal deodorant	Dec. 13, 1994	1867402	Guerlain, Inc. (NY)
GUERLAIN	3, 4, & 21	Perfume; eau de toilette; eau de cologne; eau de parfum; eau de senteur (alcohol-free toilet water); parfum de toilette; body shampoo; bath oil; skin cleansing cream; wrinkle removing skin care preparations; skin moisturizer; skin conditioner; skin cream; night cream; body lotion; body milk; bronzing cream; bronzing powder; make-up; foundation make-up; make-up remover; eye shadow; eye-liner; under eye concealer; mascara; eye make-up remover; face powder;	Dec. 19, 1995	1942534	Guerlain (France SAS)

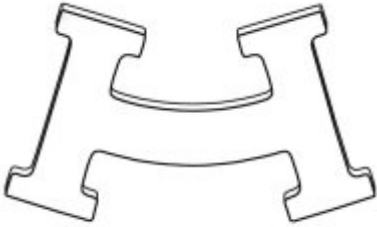
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
		lipstick; protective base coat for nails; nail polish; after-shave lotion; after-shave balm; shaving cream; personal deodorant; sun screen preparations; scented talcum powder in class 3 Scented candles in class 4 Cosmetic brushes in class 21			
AQUA ALLEGORIA	3	Cologne	Aug. 22, 2000	2379207	Guerlain (France SAS)
L'INSTANT DE GUERLAIN	3	Perfume; eau de cologne; toilet waters; perfumed body milks, body lotions, body gels, body oils, and body powders; perfumed soaps; perfumed moisturizing creams; perfumed talcum powder	Aug. 26, 2003	2756404	Guerlain (France SAS)
HABIT ROUGE	3	Eau de toilette, after-shave lotion, personal deodorant, shower gel	Apr. 20, 2004	2834416	Guerlain (France SAS)
INSOLENCE	3	Perfume, perfumery, toilet waters	Aug. 15, 2006	3129090	Guerlain (France SAS)
IDYLLE	3	Perfumery, perfumes, eau de toilette, personal deodorants, cosmetics	Dec. 22, 2009	3729592	Guerlain (France SAS)
	3	Perfumes	May 3, 2011	3953827	Guerlain (France SAS)
LA PETITE ROBE NOIR	3	Perfumery	Jan. 3, 2012	4080150	Guerlain (France SAS)
IMAGINE	3	Perfumes; eau de Cologne; shaving preparations; aftershave balm; body deodorants	Dec. 4, 2018	5620079	Guerlain (France SAS)

HERMÈS INTERNATIONAL

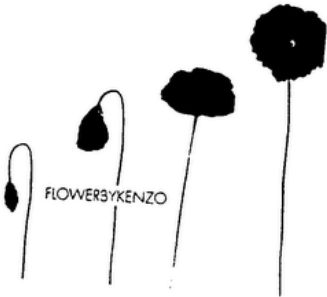

OWNER	TRADEMARK	Reg. Date	Reg. No.	REGISTRAR	Classes
HERMES INTERNATIONAL	HERMÈS	2/29/1972	930149	USA	03
HERMES INTERNATIONAL		12/29/1998	2213940	USA	08, 09, 21, 28, 34
HERMES INTERNATIONAL		6/27/1939	368785	USA	08, 14
HERMES INTERNATIONAL		7/18/1939	369271	USA	14
HERMES INTERNATIONAL		8/1/1939	369681	USA	18
HERMES INTERNATIONAL		8/4/1987	1450841	USA	20
HERMES INTERNATIONAL		8/15/1939	370082	USA	21
HERMES INTERNATIONAL		3/9/1971	909653	USA	24
HERMES INTERNATIONAL		8/8/1939	369944	USA	25
HERMES INTERNATIONAL		10/8/1968	858299	USA	25
HERMES INTERNATIONAL		1/16/2007	3198963	USA	35
HERMES INTERNATIONAL		12/27/2005	3036116	USA	35
HERMES INTERNATIONAL		8/15/1978	1099896	USA	42
HERMES INTERNATIONAL		5/1/2001	2447278	USA	08, 09, 16, 20, 24, 28, 34
HERMES INTERNATIONAL		10/8/1985	1364533	USA	21
HERMES INTERNATIONAL		1/6/1970	883588	USA	03, 14, 18, 25
HERMES INTERNATIONAL		1/16/2007	3198973	USA	35
HERMES INTERNATIONAL		12/27/2005	3036117	USA	35
HERMES INTERNATIONAL		9/24/2002	2623070	USA	37, 40, 41
HERMES INTERNATIONAL		8/15/1978	1099897	USA	42
HERMES INTERNATIONAL		9/4/1984	1292597	USA	03, 09, 14, 16, 18, 24, 25, 28, 34
HERMES INTERNATIONAL		5/27/1975	1011908	USA	14

HERMES INTERNATIONAL		11/23/1993	1806107	USA	18
HERMES INTERNATIONAL		3/20/2001	2436099	USA	03, 08, 09, 14, 16, 18, 20, 24, 25, 28, 34
HERMES INTERNATIONAL		9/6/2005	2991927	USA	16, 18
HERMES INTERNATIONAL		12/4/2007	3348789	USA	06, 08, 14, 16, 18, 21, 24, 25, 26, 28, 34
HERMES INTERNATIONAL		1/20/2009	3564868	USA	06, 08, 14, 16, 18, 20, 21, 22, 24, 25, 26, 28, 34
HERMES INTERNATIONAL	TERRE D'HERMES	4/11/2006	3079963	USA	03
HERMES INTERNATIONAL		4/27/2007	3233558	USA	06, 14, 18, 25, 26


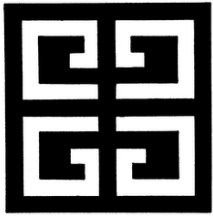
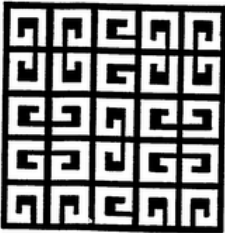
HERMES INTERNATIONAL		4/27/2007	3233557	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL	LINDY	48/5/2008	3480825	USA	18
HERMES INTERNATIONAL		1/13/2009	3561331	USA	06, 14, 16, 18, 21, 25, 26, 34
HERMES INTERNATIONAL		3/29/2011	3936105	USA	18
HERMES INTERNATIONAL		4/5/2011	3939358	USA	18
HERMES INTERNATIONAL		7/26/11	4000067	USA	3, 14, 18, 25, 35

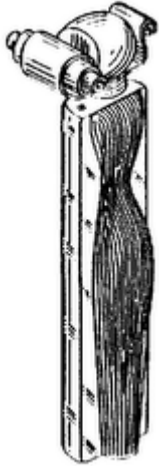
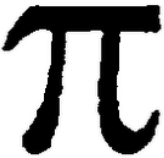
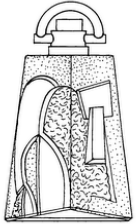
HERMES INTERNATIONAL		2/17/2015	4687132	USA	25, 26
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KENZO

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
KENZO	3	Perfumery	Jan. 8, 1985	1312942
KENZO JUNGLE	3	Perfumery, namely toilet waters, perfumes	Nov. 19, 1996	2017313
	3	Perfumery, namely, toilet water, cosmetics, namely, beauty creams for the face and the body, body lotions	Sep. 10, 2002	2616977
KENZOAMOUR	3	Perfumes; toilet water	June 20, 2006	3106879
UNIDENTIFIED FRAGRANCE OBJECT	3	Perfumery	Aug. 10, 2010	3832756
	3	Perfumery	Nov. 29, 2011	4062441

LVMH FRAGRANCE BRANDS


<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
GIVENCHY	3	Perfume, toilet water, bath oil, face lotion and talcum powder	Sep. 5, 1972	942407
YSATIS	3	Toilet waters, cosmetic products-- namely, perfumed body cream, perfumed body lotion	Aug. 13, 1985	1353577
XERYUS	3	Toilet water; personal soaps; personal deodorant	June 23, 1987	1443773
GIVENCHY 	3	Bath soaps; perfumes, toilet water and cologne; lotions and creams for shaving; lotions, milks, creams and gels for the face and body; cosmetic preparations for the bath, namely, - gels, talc and and personal deodorants (deodorant sticks)	May 23, 1989	1539965
	3	Toilet soaps; perfumery; namely, perfumes, eau de cologne and toilet water; cosmetic preparations; namely, lotions, milks, creams and gels for the face and body, lipsticks, nail varnish, makeup foundation and powder, mascara, eye shadow, cosmetic pencils, beauty masks; suntan preparations; namely, gels and creams; cosmetic preparations for the bath; namely, gels, oils, creams, bath salts; deodorants for personal use	June 2, 1992	1689748
AMARIGE	3	Perfume, toilet water, cosmetic products; namely, lotions, milks, creams, gels for face and body, cosmetic preparations for the bath; namely, gels, creams, deodorant for personal use	Sep. 22, 1992	1717361
	3	Toilet water, toilet soap	Apr. 27, 1993	1767120
INSENSE	3	Perfumes, toilet water	Jan. 10, 1995	1872169
TARTINE ET CHOCOLAT	3	Toilet water	Mar. 10, 1998	2142392

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfume	Aug. 11, 1998	2180108
ORGANZA	3	Perfume	Aug. 25, 1998	2184436
HOT COUTURE	3	Perfumes, and toilet water, lotions, for the body, body gel	Feb. 13, 2001	2427861
	3	Toilet soaps, perfumes, toilet water, deodorants for personal use, after-shave lotions, preparations for hair, namely, shampoos	Sep. 18, 2001	2489772
	3	Toilet water	July 2, 2002	2587049
VERY IRRESISTIBLE GIVENCHY	3	Perfumes, perfumery, toilet waters, lotions for the body; deodorants for personal use	Oct. 24, 2006	3161498
ANGE OU DEMON	3	Perfumes, perfumery, cosmetics	Dec. 18, 2007	3357425

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
 <p>The image shows a tall, rectangular perfume bottle for 'Ange du Démon' by Givenchy. The bottle is white with a black label in the center that reads 'ange du démon' in a stylized font. Above the label is a vertical line of small, round, metallic-looking beads. At the bottom of the bottle is the Givenchy logo (a square with a cross inside) and the word 'GIVENCHY' above 'PARIS'.</p>	3	Perfumes; eau de cologne and eau de toilette	Jan. 22, 2008	3371362
PLAY	3	Skin care products, namely, aftershave tonics; scented preparations, namely, eau de toilettes, fragrances for personal use	Nov. 3, 2009	3706948
GIVENCHY	3	Perfumery, cosmetics, makeup, non-medicated skin care preparations, non-medicated skin and facial cleaners, skin lightening preparations and non-medicated toiletries	Jan. 3, 2012	4079380

MICHAEL KORS, L.L.C.


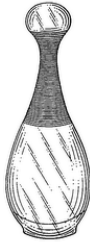
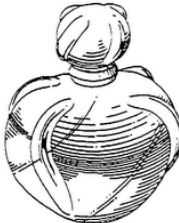
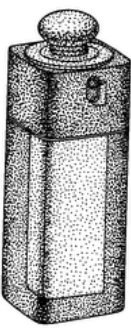
<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
MICHAEL KORS	June 4, 1996	1977507	25: Ladies' clothing; namely, dresses, jackets, pants, skirts, shirts, blouses, shorts, sweaters, coats, swimwear.
MICHAEL KORS	April 1, 1997	2049326	25: Clothing for use by women; namely, anoraks; aprons; ascots; babushkas; bandanas; bathrobes; belts; blazers; blouses; bodysuits; boleros; boots; boxer shorts; brassieres; briefs; caftans; camisoles; capes; caps; cardigans; chemises; clogs; fur coats; suit coats; corselets; culottes; earmuffs; galoshes; garter belts; girdles; gloves; nightgowns; halter tops; hats; headbands; hosiery; jeans; jogging suits; jumpers; jumpsuits; kerchiefs; kimonos; leggings; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; negligees; nightshirts; overalls; overshoes pajamas; panties; pantsuits; pantyhose; parkas; pedal pushers; peignors; pinafores; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; stockings; stoles; suits; suspenders; sweat pants; sweat shirts; t-shirts; trousers; tuxedos; underpants; vests; vested suits; and warm-up suits; and, clothing for use by men; namely, anoraks; ascots; bandanas; bathrobes; belts; blazers; boots; boxer shorts; briefs; capes; caps; cardigans; clogs; fur coats; suit coats; earmuffs; galoshes; gloves; hats; headbands; hosiery; jeans; jogging suits; kerchiefs; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; nightshirts; overalls; overshoes; pajamas; pantsuits; parkas; pedal pushers; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; suits; suspenders; sweat pants; sweat shirts; t-shirts; trousers; tuxedos; vests; vested suits; and warm-up suits.
MICHAEL KORS	December 18, 2001	2520757	18: Handbags, billfolds, credit card cases, key cases, and tote bags.
MICHAEL KORS	December 18, 2001	2520758	9: Eyeglasses, eyeglass cases.
MICHAEL KORS	March 12, 2002	2547039	35: Retail store services in the fields of clothing, jewelry and clothing accessories.
MICHAEL KORS	April 22, 2003	2708259	3: Cosmetics; namely, body lotion, cologne, perfume, and shower gel.

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
MICHAEL MICHAEL KORS	April 11, 2006	3080631	14: Eyeglass frames, eyeglasses, sunglasses, eyeglass cases, carrying cases, namely, attaché cases; bags, namely, tote bags; luggage; suitcases; handbags; purses; wallets; men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters, belts, hosiery, bathing suits, halter tops, socks, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, t-shirts, tuxedos, vests, ties; undergarments for men and women, namely, boxer shorts, bras, bustiers, camisoles, nightgowns, nightshirts, pajamas, panties, undershirts, underwear; footwear and headwear; belts.
MICHAEL KORS	October 17, 2006	3160981	14: Watches.
	December 18, 2007	3356080	18: Handbags and small leather goods, namely, wristlet bags.
MK MICHAEL KORS	May 27, 2008	3438412	9: Eyeglass frames, eyeglasses, sunglasses, eyeglass cases, eye shades, protective eye wear and eye wear for sports; handbags; men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters, belts, hosiery, bathing suits, halter tops, socks, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, T-shirts, tuxedos, vests, ties; undergarments for men and women, namely, boxer shorts, bras, bustiers, camisoles, nightgowns, nightshirts, pajamas, panties, undershirts, underwear, footwear and headwear; belts.
MK MICHAEL KORS	November 18, 2008	3535310	14: Watches.
MICHAEL KORS	November 8, 2011	4052748	14: Jewelry.
MICHAEL MICHAEL KORS	November 8, 2011	4052752	14: Jewelry and watches.
MICHAEL KORS	May 14, 2013	4334410	9: Protective cases, covers and carrying cases for mobile phones, portable media players, personal digital assistants, laptops and tablet computers.

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
MICHAEL MICHAEL KORS	May 14, 2013	4334409	9: Protective cases, covers and carrying cases for mobile phones, portable media players, personal digital assistants, laptops and tablet computers.

Parfums Christian Dior

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
Christian Dior	3 & 5	Face and body creams, skin, face and body powders, lipstick, rouge and filled rouge compacts, perfumes, toilet water	Apr. 21, 1953	573430
<i>Miss Dior</i>	3 & 5	Perfumes, toilet waters, skin creams and lotions	July 14, 1953	577253
DIORISSIMO	3 & 5	Cosmetics and toilet preparations-namely, perfumes, toilet water	July 19, 1960	701515
EAU SAUVAGE		Men's eau de cologne		884294
DIORESSENCE	3 & 5	Perfumes	Jan. 19, 1971	906347
DIORELLA	3	Perfumes, toilet water, eau de cologne	Jan. 8, 1974	976471
POISON	3	Perfumes, eaux de toilette, milks for the care of the body	Nov. 13, 1984	1304580
FAHRENHEIT	3	Perfumes, face creams	Apr. 5, 1988	1482938
DUNE	3	Cosmetics, namely, creams, lotions body, perfumery	Feb. 13, 1990	1582150
DOLCE VITA	3	Perfume, toilet waters	Dec. 31, 1996	2027819
CHRISTIAN DIOR	3	Perfumes, eau de cologne, toilet waters; perfumed body milks, body lotions, body gels, body oils and body powders; perfumed bath and shower gels, perfumed soaps, perfumed moisturizing body creams, personal deodorants for the body; pre-shave and after-shave lotions, shaving foams and gels, emulsions and balms; shampoos, gels and lotions for body, creams, milks, lotions, gels and emulsions for the care of the face, hands and body, cream and gel masks; exfoliating creams, lotions and gels; mascara, eye liner, eye shadow, blush, pressed powder, loose powder, foundation make-up, foundation cream, foundation base, moisturizing cream base, lipstick, nail enamel, base and top coat for nails, nail polish remover, face and eye make-up remover; cleansing milks, gels and lotions for the face	Apr. 28, 1998	2153858

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfume, toilet waters, perfumned body milk, perfumed bath and shower foams and gels, perfumed soaps, perfumed moisturizing creams	May 22, 2001	2453926
J'ADORE	3	Perfume and toilet waters	May 29, 2001	2455674
	3	Perfume, eau de parfum spray, toilet water	Jan. 15, 2002	2529417
	3	Perfumes	Apr. 30, 2002	2564970
J'ADORE	3	Perfume, eau de toilette, and milks for the care of the body	Mar. 11, 2003	2696047
HYPNOTIC POISON	3	Perfume, toilet waters, perfumed body milk, perfumed bath and shower foams and gels	Oct. 7, 2003	2771657
FAHRENHEIT	3	Eau de toilette, summer eau de toilette, after-shave, after-shave balm, personal deodorants, shower gels	Mar. 16, 2004	2823387
	3	Perfume, toilet waters	Mar. 23, 2004	2824987

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
DIOR ADDICT	3	Perfume, toilet waters, lipstick	July 27, 2004	2867329
PURE POISON	3	Perfumery	Aug. 17, 2004	2874846
	3	Perfumery; cosmetics	June 21, 2005	2963354
	3	Perfumes	Oct. 25, 2005	3008784
EAU NOIRE	3	Perfumes	Dec. 27, 2005	3034741
<i>Miss Dior Chérie</i>	3	Perfumes	Apr. 25, 2006	3085164
	3	Perfumes, eau de cologne, eau de toilette, milks, lotions, creams, emulsions, and perfumed gels for body and face care	June 13, 2006	3104002
	3	Perfumery, perfumes, toilet waters	Nov. 28, 2006	3176192
DIOR	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal deodorants, shower and bath gel, sun screen preparations, and hair care preparations	Sept. 25, 2007	3297261
DIOR	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal	Sep. 25, 2007	3297261

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
		deodorants, shower and bath gel, sun screen preparations, and hair care preparations		
LA COLLECTION PARTICULIERE	3	Perfumes, perfumery, eau de cologne	Oct. 28, 2014	4628811
SAUVAGE	3	Perfumery; toilet water; cosmetics; after-shave lotions; after-shave balms; deodorant for personal use; perfumed gels for the shower	Oct. 10, 2017	5304379

PRL USA Holdings, Inc.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
POLO	1,363,459	10/1/85	Clothing-namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats, and dresses.
POLO	1,446,173	7/7/87	Frames for prescription and non-prescription lenses, and complete sunglasses.
RALPH LAUREN	1,447,282	7/14/87	Frames for prescription and non-prescription lenses and complete sunglasses.
POLO	1,508,314	10/11/88	Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats, belts and socks and ladies' blouses, skirts, suits and dresses.
RALPH LAUREN word mark	1,624,989	11/27/90	Clothing - namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.
RALPH LAUREN	1,835,393	5/10/94	Jewelry.
DOUBLE RL	1,876,705	1/31/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
RRL DESIGN	1,891,143	4/25/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
PRL AND DESIGN	1,932,955	11/7/95	Wearing apparel, namely jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
POLO SPORT	1,951,601	1/23/96	Wearing apparel, namely pants, shorts, jackets, T-shirts, sport shirts, knit shirts, sweatshirts, hats, socks and footwear.
RALPH LAUREN	1,976,324	5/28/96	Clutches, shoulder bags, cosmetic bags, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, circular cosmetic and personal grooming bags, clothing and personal item bags with drawstrings for over the shoulder use, grooming kits in the nature of small traveling bags for carrying personal hygiene items, traveling bags designed for holding suits, tie cases, satchels, purses and other personal item bags with rigid top supports, garment bags for travel, traveling bags for carrying personal items and clothing, coin bags, drawstring pouches, overnight bags, wallets and key holders, all sold empty.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
POLO JEANS CO.	2,049,948	4/1/97	Wearing apparel, namely, jeans, T-shirts, knit shirts, sweatshirts, overalls, blouses, skirts, dresses and hats.
DESIGN ONLY polo player astride horse	2,052,315	4/15/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, pole bags, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
POLO RALPH LAUREN with the horse and polo rider emblem	2,077,082	7/8/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
RALPH	2,175,394	7/21/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
CHAPS	2,137,833	2/17/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
LAUREN	2,246,900	5/25/99	Wearing apparel, namely, topcoats, raincoats, jackets, suit jackets, suit coats, sport coats, sport jackets, blazers, blouses, shirts, shirt jackets, pants, skirts, dresses, sweaters, tee shirts, hats and scarves.
RLX	2,276,536	9/7/99	Wearing apparel, namely, pants, shorts, jackets, coats, woven shirts, T-shirts, knit shirts, sweaters, sweatshirts, blouses, skirts, dresses, hats, footwear, socks, hosiery and gloves.
RL	2,312,818	2/1/00	Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, overalls, pants, sweaters, shorts, vests, ties, bathing suits, scarves, hosiery, bodysuits, belts, blouses, skirts, dresses, coats, hats and shoes.
RUGBY	2,339,652	4/11/00	Men's and women's clothing not specifically adapted to be worn while playing rugby, namely, jackets, vests, shirts, sweatshirts, t-shirts, men's shorts and pants, and women's shorts, dresses, blouses, [scarves,] belts and shoes
LAUREN	2,419,959	1/9/01	Handbags, clutches, shoulder bags, tote bags, backpacks, duffle bags, travel bags, suit bags, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
CHAPS	2,505,790	11/13/01	Clothing, namely, sport shirts, sweaters, sweatshirts, t-shirts, shorts, jackets, pants, sport jackets and suits.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
RALPH	2,527,823	1/8/02	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
POLO GOLF	2,686,291	2/11/03	Wearing apparel, namely, shirts, sweaters, pants, sweatshirts and t-shirt.
PINK PONY	3,036,422	12/27/05	Clothing – namely, sweaters and t-shirts.
RL	3,120,485	7/25/06	Eyeglasses, sunglasses, cases for eyeglasses and sunglasses.
RALPH LAUREN GOLF	3,213,555	2/27/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
RALPH LAUREN TENNIS	3,215,910	3/6/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
RALPH LAUREN SPORT	3,218,130	3/13/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests,

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
			undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
C (Stylized)	3,225,869	4/3/07	Wearing apparel, namely, sport shirts, knit shirts, sweaters, sweatshirts, t-shirts, blouses, shorts, jackets, pants, jeans, overalls, skirts, dresses, hats, socks and swimwear.
CHAPS	2,137,833	2/17/98	Frames for prescription and non-prescription lenses and complete sunglasses
PINK PONY	3,245,586	5/22/07	Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.
LAUREN JEANS COMPANY	3,254,299	6/19/07	Wearing apparel, namely, jeans, vests, jackets, coats, shirts, sweatshirts, overalls, blouses, skirts, dresses, hats, pants, socks, gloves and footwear.
RL	3,687,528	9/22/09	Handbags, clutches, shoulder bags, tote bags, backpacks, saddle bags, duffle bags, travel bags, suit bags, satchels, hip packs, roll bags, carryalls, garment bags, suit cases, coin purses, drawstring pouches, briefcases, attaché cases, wallets, key cases, billfolds, tie cases, credit card cases, business card cases, grooming kits sold empty, cosmetics and toilet bags sold empty, shaving bags sold empty, and umbrellas.
DESIGN ONLY	4,169,636	7/10/12	Handbag.
DENIM & SUPPLY RALPH LAUREN	4,430,736	11/12/13	Belts, blouses, coats, dresses, hats, jackets, pants, scarves, shirts, shorts, skirts, t-shirts and tops.
DENIM & SUPPLY RALPH LAUREN	4,438,197	11/26/13	Handbags.
POLO	1,532,557	4/4/89	Lotions for use after shaving
RALPH	2,562,975	4/23/02	Eau de toilette, skin and body lotions
LAUREN	1,489,796	5/31/88	Toilet water
RALPH LAUREN	1,222,278	1/4/83	Cologne, aftershave, aftershave balm, antiperspirant, personal deodorant, toilet water, body lotion, bath oil, body powder, perfume
Horse & Polo Rider Design	1,212,060	10/12/82	Cologne, aftershave, aftershave balm, antiperspirant, toilet water
RL	2,891,892	10/5/04	Fragrances, namely, eau de toilette, namely, after-shave splash, after-shave balm
RALPH LAUREN ROMANCE	2,318,372	2/15/00	Eau de parfum
POLO RED	4,506,000	4/1/14	Eau de toilette, after shave preparations, body spray, and personal deodorant
POLO BLUE	2,782,617	11/11/03	Eau de toilette, after shave gel, shower gel, and personal deodorant
POLO SPORT	1,858,094	10/11/94	Toilette water, deodorants
POLO BLACK	3,130,913	8/15/06	Eau de toilette, after shave splash, after shave gel, shower gel, personal deodorant
LAUREN RALPH LAUREN	1,160,547	7/14/81	Cologne, toilet water, body lotion, and perfume
CHAPS	3,358,110	12/18/07	Eau de toilette

TIMBERLAND, A DIVISION OF VF OUTDOOR, INC. and TBL LICENSING LLC

Trademark	Registration	Registration	Goods
TIMBERLAND	2,932,268	3/15/05	Footwear; clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, shorts, headwear, gloves, neckwear, belts, sweatshirts, t-shirts, vests, socks.
TREE DESIGN	2,947,228	5/1/05	Footwear; clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, shorts, headwear, gloves, neckwear, belts, sweatshirts, t-shirts, vests, socks.
TIMBERLAND (word mark)	1,592,927	4/24/90	Watches.
TIMBERLAND (word mark)	1,600,223	6/12/90	Shoe care products, namely water repellant.
Timberland Tree circle design	1,610,987	8/28/90	Shoe care products, namely water repellant.
Timberland Tree circle design	1,607,424	7/24/90	Watches.
TIMBERLAND (word mark)	1,523,598	2/7/89	Clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, caps, hats, gloves, scarf's, belts, t-shirts and vests.
Timberland Tree circle design	1,552,963	8/22/89	Clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, caps, hats, gloves, scarf's, belts, t-shirts and vests.
TIMBERLAND (word mark)	1,588,288	3/20/90	Store services in clothing, footwear, outerwear, leather or leather and fabric accessories, such as, but not limited to, portfolios, handbags, belts, keychains, calendar books, wallets, tie cases, and the like,
TIMBERLAND (word mark)	1,849,012	8/9/94	Sunglasses.
Tree design	1,843,478	7/5/94	Sunglasses.
TBL	2,112,526	11/11/97	Clothing, namely, jackets, hats, shirts and sweatshirts.
Timberland Tree circle design	1,502,205	8/30/88	Leather goods, namely, key fobs, luggage, tags, credit card cases, wallets, portfolio type briefcases, duffel bags, backpacks and
TIMBERLAND (word mark)	1,502,204	8/30/88	Leather goods, namely, key fobs, luggage tags, credit card cases, wallets, portfolio type briefcases, duffel bags, backpacks and
TIMBERLAND word with tree circle design	1,355,531	8/20/85	Clothing, namely footwear, shirts, jackets, coats, sweatshirts, T-shirts, jerseys, sweaters,
TIMBERLAND (word mark)	1,300,704	10/16/84	Footwear, namely, men's women's and children's boots, work shoes, hiking shoes, boat shoes and other footwear.
Timberland Tree circle design	1,075,061	10/11/77	Footwear, namely, men's, women's and children's boots, work shoes and hiking